

UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF
NEW YORK

DEBTORS:

GMAC MORTGAGE, LLC
RESIDENTIAL CAPITAL, LLC, et al.

CASE NO: 12-12020

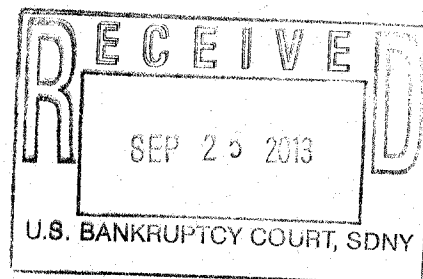
TITLE OF OBJECTION: "REASON FOR DISALLOWANCE"

Kenneth Russo Jr. and Rayietta Hill are one of the claimants in Case No: 12-12020 claiming \$29,742.00 in restitution for lost wages, salary and commissions and owed taxes and penalties to governmental units due to extreme mental anxiety and physical stress. The Supreme Court in Pioneer Inv. Servs. Co. v. Brunswick Assoc. Ltd. P'ship, 507 U.S. 380, 389 (1993) enumerated four factors to determine whether or not late filings of claims are excusable: (1) whether allowing the late claim will prejudice the debtor; (2) the length of the delay in filing the claim and the resulting potential impact on the judicial proceedings; (3) the reason for the delay, including whether the delay was within the reasonable control of the creditor filing the claim; and (4) whether the creditor that filed the claim acted in good faith.

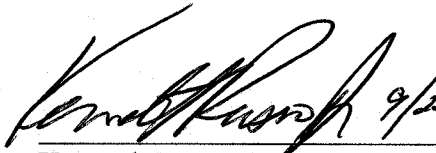
Allowing our late claim in this enormous case will not in anyway prejudice the debtor. The length of the delay in filing the claim has no resulting impact on the judicial proceedings. The delay was not in the reasonable control of the creditor filing the claim since the creditor was never officially notified by the debtor of any bankruptcy proceedings. The creditor never received a formal notice by fax, email, US Mail, registered mail, certified mail, or any overnight express delivery service by the debtor, the debtor's legal representation, or anyone else connected to this case/lawsuit. The creditor found out about Case No: 12-12020 on April 17, 2013 and immediately sent out the Proof of Claim to the US Bankruptcy Court for the Southern District of New York the same day. It's fairly difficult to provide a timely Proof of Claim when the creditors had no idea there was even a formal case or bankruptcy hearing scheduled. The creditors respect the procedure of the United States Bankruptcy Court for the Southern District of New York and have acted in good faith.

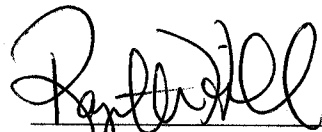
The creditors DO oppose the expungement and/or disallowance of the debtors claim and ask the Court to ALLOW the creditors LATE-FILED BORROWER CLAIMS in the proceedings (Claim No. 6843).

DATED: September 22, 2013



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 9/22/13
Kenneth Russo Jr.

 9/22/2013
Rayietta Hill